REMARKS

Claims 1, 2, and 4-32 are pending in the Application and all were rejected in the final Office action mailed August 20, 2008. Claims 1, 11, 15, 21, and 25 are independent claims. Claims 2 and 4-10, 12-14, 16-20, 22-24, and 26-32 depend, respectively, from independent claims 1, 11, 15, 21, and 25.

Applicants' representative expresses appreciation for the opportunity to speak with Examiner Djenane Bayard, on November 20, 2008. Examiner Bayard graciously agreed to a telephone interview with Mr. Borg if the claims in the Application are not found to be in condition for allowance, to resolve any remaining issues and further prosecution of the Application towards issuance.

Applicants respectfully request reconsideration of pending claims 1, 2, and 4-32, in view of the following remarks.

Amendments to Claims

Applicants have amended claims 1, 11, 15, 21, and 25 to further clarify the subject matter of the claims. Support for the amendments to claims 1, 11, 15, 21, and 25 may be found, at least, at Figs. 2 and 3, and paragraphs [0050]-[0054], [0057]-[0059], and [0060]-[0073] of the Application. Applicants respectfully submit that these amendments do not add new matter.

Rejections of Claims

Claims 1, 2, and 4-7, 10-12, and 14 were rejected under 35 U.S.C. 102(e) as being anticipated by Zhao (US 2002/0124007). Claims 15-27 and 32 were rejected under 35 U.S.C. 102(e) as being anticipated by Merrill et al. (US 2004/0002943, hereinafter "Merrill"). Claims 8 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Herschberg et al. (US 2003/0022657, hereinafter "Herschberg"). Claim 13 was rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Whelan et al. (US 2004/0203593, hereinafter "Whelan"). Claims

28-31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Merrill in view of Herschberg. Applicants respectfully traverse the rejections. Nevertheless, Applicants have amended claims 1, 11, 15, 21, and 25 to further clarify the subject matter of the claims, rendering the rejections of the Office action moot.

Applicants respectfully submit that the claims in the Application are allowable for at least the reasons set forth during prosecution, and those that follow.

I. Zhao Does Not Anticipate Claims 1, 2, 4-7, 10-12, And 14

Claims 1, 2, and 4-7, 10-12, and 14 were rejected under 35 U.S.C. 102(e) as being anticipated by Zhao (US 2002/0124007).

With regard to the anticipation rejections, MPEP 2131 states, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). MPEP 2131 also states, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

With regard to independent claim 1, Applicants respectfully submit that claim 1 has been amended to recite "[a] mobile services network for management of service components in an electronic device, the mobile services network comprising: a plurality of regions of data and content in the electronic device; a plurality of server-side components, each of the server-side components remotely managing at least one associated region of the plurality of regions of data and content in the electronic device; and wherein remote access to each of the plurality of regions of data and content in the electronic device is controlled by an associated one of a plurality of security mechanisms enabling a particular one of the plurality of server-side components to securely access or manage the at least one associated region of the plurality of regions of data and content." Applicants respectfully submit that Zhao does not teach each and every element of Applicants' amended claim 1, as required by M.P.E.P. §2131.

More specifically, Zhao does not teach or suggest, at least, "…wherein remote access to each of the plurality of regions of data and content in the electronic device is controlled by an associated one of a plurality of security mechanisms enabling a particular one of the plurality of server-side components to securely access or manage the at least one associated region of the plurality of regions of data and content." Applicants respectfully submit that Zhao does not teach or suggest Applicants' feature "…a plurality of security mechanisms…", let alone where one of the "plurality of security mechanisms" is associated with each of "a plurality of regions of data and content" in the electronic device, and <u>controls</u> access by one of "a plurality of server side components" to the "associated region of data and content" in the electronic device, in accordance with Applicants' amended claim 1. Applicants have reviewed Zhao and find that Zhao discloses a single "security code" used to permit access to an electronic device by any entity needing access to the device. Zhao states at ¶[0029]:

> Client management layer 27 serves to manage the clients and the connection modes between network server 20 and intelligent devices 15A-15N. Specifically, <u>when a client on network 11 sends a command signal to network server 20 requesting access to an intelligent device, e.g., intelligent device 15A, in Intranet 16, client management layer 27 preferably checks the device name of device security code in the access command signal to determine the authority and limitation of the client in accessing intelligent device 15A.</u>

The portion of Zhao shown above simply teaches that when "a client" wants access to an "intelligent device 15A", a "client management layer 27" check a "device security code" to determine authority and limitation in accessing the "intelligent device 15A". This portion of Zhao fails to say anything about a "plurality of security mechanisms" that each control access to an associated one of "a plurality of regions of data and content" in an electronic device, in accordance with Applicants' amended claim 1. The use of a single "security code" and "security mechanism" for each "intelligent device 15A-15N" is also evident at ¶[0070], and the illustration of Fig. 4. Applicants

have reviewed Zhao, and have been unable to identify any teaching in Zhao regarding the use of more than one security mechanism in accessing data and content in an electronic device, not to mention the use of multiple security mechanisms each associated with access to <u>different</u> regions of data and content in the electronic device. Applicants respectfully request, if the Applicants have inadvertently overlooked such teachings, that the Office specifically identify any allegedly relevant teachings of Zhao, including a detailed explanation of how and why the cited portion of Zhao teaches each and every element of Applicants amended claim 1, in accordance with M.P.E.P. §2131.

In addition to the above, Applicants respectfully submit that Zhao fails to teach at least Applicants' feature "...remote access to each of the plurality of regions of data and content <u>in the electronic device</u>", as recited by Applicants' claim 1. Zhao teaches at ¶[0030]:

> Database layer 26 includes the parameters related to the statuses of operations of intelligent devices 15A-15N in Intranet 16. In accordance with the present invention, when a client seeks to an access intelligent device, e.g., intelligent device 15A, in Intranet 16, <u>the client does not directly access intelligent device 15A. Instead, the client accesses the parameters related to status and operation of intelligent device 15A in database layer 26 of network server 20. Database layer 26 is able to insulate intelligent devices 15A-15N in Intranet 16 from inadvertent inferences from the clients accessing intelligent devices 15A-15N.</u>

Applicants respectfully submit that this portion of Zhao teaches that devices wising to access parameters for "intelligent devices 15A-15N" access <u>copies</u> of the parameters of the "intelligent devices 15A-15N" that are kept in "database layer 26" of "network server 20". Zhao explains that this is done "...to insulate intelligent devices 15A-15N in Intranet 16 from inadvertent inferences from the clients accessing intelligent devices 15A-15N." Applicants respectfully submit that <u>copies</u> of parameters kept in the "database layer 26" of "network server 20" **are not** equivalent to and do not teach Applicants' claim feature, in that such copies cannot instantaneously reflect a change to

a parameter made by one of the "intelligent devices 15A-15N" or a user of such a device. Therefore, Applicants respectfully submit that Zhao does not teach or suggest, at least Applicants' feature, "...remote access to each of the plurality of regions of data and content in the electronic device", as recited by amended claim 1.

Based at least upon the above, Applicants respectfully submit that Zhao does not teach each and every element of Applicants' amended claim 1, as required by M.P.E.P. 2131, and that Zhao fails to anticipate Applicants' claim 1, or any claims that depend therefrom. Accordingly, Applicants respectfully request that the rejection of claims 1, 2, 4-7, and 10 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to independent claim 11, Applicants respectfully submit that claim 11 has been amended to recite limitations similar in many ways to those now recited by amended claim 1. Applicants respectfully submit, therefore, that amended claim 11 is allowable over Zhao for at least the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejections of claims 10-12 and 14 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

II. Merrill Does Not Anticipate Claims 15-27 And 32

Claims 15-27 and 32 were rejected under 35 U.S.C. 102(e) as being anticipated by Merrill.

With regard to independent claim 15, Applicants respectfully submit that claim 15 has been amended to recite "[a] mobile network for updating firmware and software in an electronic device, the mobile network comprising: a management server facilitating management of firmware and software in the electronic device; a corporate virtual user group management server for corporate virtual user group management; a corporate software repository being employed for corporate virtual user group management and for securely distributing corporate software and corporate data to at least one of a plurality of separate segments of non-volatile memory in the electronic device, the at least one segment associated with a particular user group; and wherein remote access

to each of the plurality of segments of non-volatile memory by the management server is controlled by an associated one of a plurality of security mechanisms in the electronic device." Applicants respectfully submit that Merrill does not teach each and every element of Applicants' amended claim 15, as required by M.P.E.P. §2131.

For example, Merrill does not teach or suggest, at least, "...wherein remote access to each of the plurality of segments of non-volatile memory by the management server is controlled by an associated one of a plurality of security mechanisms in the electronic device." Applicants respectfully submit that Merrill does not teach or suggest "...a plurality of security mechanisms...", as recited by amended claim 15. Merrill does disclose "...[a]uthenticating information (e.g., one or more digital certificates) corresponding to the specific source are maintained by the mobile device in a trusted source list..." and the use of "one or more security functions", at ¶[0034], which recites:

> In one implementation, the mobile device is preconfigured to request download instructions from a specific management server source. Authenticating information (e.g., one or more digital certificates) corresponding to the specific source are maintained by the mobile device in a trusted source list. Subsequent to requesting and receiving download instructions from the specific source, the mobile device authenticates the received instructions via the trusted source list. Upon successful verification, the instructions are used to request and receive one or more offerings from at least one location specified by the verified instructions. The received offering(s) is/are further checked for authenticity, for example, via one or more security has functions. In this manner, the system management framework provides a multiple signature system that substantially eliminates undesired security exposure when the mobile device is operating beyond the protection of a corporate firewall.

This portion of Merrill teaches that a "mobile device" requests "download instructions" from a "specific management server source" and that "authenticating information (e.g., one or more digital certificates" corresponding to the "specific source" is maintained by the "mobile device." Merrill does not teach or suggest, however, a

"plurality of segments of non-volatile memory" where "access to each of the plurality of segments of non-volatile memory" by a "management server" is controlled by an "associated one" of a "plurality of security mechanisms in the electronic device", in accordance with Applicants' amended claim 15. Applicants respectfully submit that the use of "one or more digital certificates" in authentication of information "corresponding to a specific source" is not the same as and does not anticipate Applicants' use of "a plurality of <u>security mechanisms</u>" to control <u>access</u> to associated "...segments of non-volatile memory" by a "management server", in accordance with Applicants' amended claim 15. Applicants respectfully submit that the use of "one or more digital certificates" simply teaches one "security mechanism", namely, the use of a "digital certificate".

Applicants have reviewed Merrill, and have been unable to identify relevant teachings in Merrill where remote access to each of "a plurality of segments of non-volatile memory" by a management server is controlled by "an associated one' of "a plurality of security mechanisms" in the electronic device. If the Applicants have inadvertently overlooked such teachings, Applicants respectfully request that the Office specifically identify any allegedly relevant teachings of Merrill, and provide a detailed explanation of how and why the cited portion of Merrill teaches each and every element of Applicants' amended claim 15, in accordance with M.P.E.P. §2131. In the absence of such support, Applicants respectfully submit that Merrill does not teach or suggest, at least Applicants' feature, "...wherein remote access to each of the plurality of segments of non-volatile memory by the management server is controlled by an associated one of a plurality of security mechanisms in the electronic device.", as recited by amended claim 15.

Based at least upon the above, Applicants respectfully submit that Merrill does not teach each and every element of Applicants' amended claim 15, as required by M.P.E.P. 2131, that Merrill fails to anticipate Applicants' claim 15, or any claims that depend therefrom, and that claims 15-20 are allowable over Merrill. Accordingly, Applicants respectfully request that the rejection of claims 15-20 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to independent claim 21, Applicants respectfully submit that claim 21 has been amended to recite limitations similar in may ways to those recited by claim 15. Applicants respectfully submit that Merrill does not teach each and every element of Applicants' amended claim 21, as required by M.P.E.P. 2131, and that Merrill fails to anticipate Applicants' claim 21, or any claims that depend therefrom, for at least the reasons set forth above. Accordingly, Applicants respectfully request that the rejection of claims 21-24 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to independent claim 25, Applicants respectfully submit that claim 25 has also been amended to recite limitations similar to those added to claim 15. Applicants respectfully submit that Merrill does not teach each and every element of Applicants' amended claim 25, as required by M.P.E.P. 2131, and that Merrill also fails to anticipate Applicants' claim 25, or any claims that depend therefrom, for at least the reasons set forth above. Accordingly, Applicants respectfully request that the rejection of claims 25-27 and 32 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

III. The Proposed Combination Of Zhao And Herschberg Does Not Render Claims 8 And 9 Unpatentable

Claims 8 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Herschberg. Applicants respectfully Applicants respectfully submit that claims 8 and 9 depend from amended independent claim 1. Applicants believe that amended claim 1 is allowable over Zhao and Herschberg, in that Herschberg fails to overcome the shortcomings of Zhao, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 1 is allowable over the proposed combination of references, claims 8 and 9 are also allowable, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 8 and 9 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

IV. The Proposed Combination Of Zhao And Whelan Does Not Render Claim 13 Unpatentable

Claim 13 was rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Whelan. Applicants respectfully submit that claim 13 depends from amended independent claim 11. Applicants believe that amended claim 11 is allowable over Zhao and Whelan, in that Whelan fails to overcome the shortcomings of Zhao, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 11 is allowable over the proposed combination of references, claim 13 is also allowable, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claim 13 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

V. The Proposed Combination Of Merrill And Herschberg Does Not Render Claims 28-31 Unpatentable

Claims 28-31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Merrill in view of Herschberg. Applicants respectfully submit that claims 28-31 depend from amended independent claim 25. Applicants believe that amended claim 25 is allowable over Merrill and Herschberg, in that Herschberg fails to overcome the shortcomings of Merrill, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 11 is allowable over the proposed combination of references, claims 28-31 are also allowable, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 28-31 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

Conclusion

The Office action makes various statements regarding the claims and the cited references that are now moot in light of the above. Thus, Applicants will not address such statements at the present time. However, the Applicants expressly reserve the right to challenge such statements in the future should the need arise (e.g., if such statements should become relevant by appearing in a rejection of any current or future claim).

Applicants believe that all of claims 1, 2, and 4-32 are in condition for allowance. Should the Examiner disagree or have any questions regarding this submission, the Applicants invite the Examiner to contact the undersigned at (312) 775-8000 for an interview.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

Date: _____ November 20, 2008 _____ _____ /Kevin E. Borg/ _____
Kevin E. Borg
Reg. No. 51,486

Hewlett-Packard Company
Intellectual Property Administration
Legal Department, M/S 35
P.O. Box 272400
Fort Collins, CO 80527-2400